

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
V.	§	NO. 4:23CR268
	§	(Judge Jordan)
ROBERTA MARIE KHAN	§	

**MOTION FOR CONTINUANCE OF PRETRIAL MOTION DATES,  
CHANGE OF PLEA DEADLINE, AND FINAL PRETRIAL CONFERENCE DATE**

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF TEXAS;

COMES NOW, Defendant, ROBERTA MARIE KHAN, by and through her undersigned  
attorney, and files this, MOTION FOR CONTINUANCE OF PRETRIAL MOTION DATES,  
CHANGE OF PLEA DEADLINE, AND FINAL PRETRIAL CONFERENCE DATE, and would  
show this Honorable Court as follows, to-wit:

**I.**

**PROCEDURAL HISTORY**

On December 12, 2023, the Defendant appeared before United States Magistrate Judge  
Kimberly Priest Johnson for an Initial Appearance and Arraignment on a two-count Indictment, in  
which the Defendant is charged with a violation of 18 U.S.C. §§ 2422(a) & 2 (Coercion and  
Enticement and Aiding and Abetting). At that time, the Office of the Federal Public Defender for  
the Eastern District of Texas was appointed to represent the Defendant. The Final Pretrial  
Conference is scheduled for February 5, 2024.

**II.**

**GROUND FOR MOTION**

Defense counsel respectfully requests a continuance of the pretrial dates to receive and  
review the discovery in this case, and to discuss the evidence and sentencing guidelines with the

Defendant. Because of the possible punishment, the Defendant respectfully requests this additional time in order to make a fully informed decision. This request is made in order to ensure that effective assistance of counsel is provided to the Defendant.

This Motion for Continuance is not made for purposes of delay, but only in order that justice may be done. The Defendant requests that this Court make a finding that “the ends of justice served by taking such action outweigh the best interest of the public and the defendant to a speedy trial.” 18 U.S.C. § 3161(h)(7)(A).

Due to the reasons outlined above, Defendant respectfully requests an additional 60 days for the pretrial motion dates, change of plea deadline, and final pretrial conference date.

WHEREFORE PREMISES CONSIDERED, Defendant respectfully requests that the pretrial motion dates, change of plea deadline, and final pretrial conference date in this case be reset from their current setting for an additional 60 days.

Respectfully submitted,

/s/ Brian O’Shea  
BRIAN O’SHEA  
Assistant Federal Defender  
Eastern District of Texas  
7460 Warren Parkway, Suite 270  
Frisco, Texas 75034  
(469) 362-8506  
FAX: (469) 362-6010

*Attorney for Defendant*

### **CERTIFICATE OF CONFERENCE**

Prior to filing this motion, I contacted Assistant United States Attorney, Marisa Miller, and the Government does not oppose this motion.

Additionally, I contacted each of the attorneys for the co-defendants and their responses are noted below:

Rafael De La Garza II, the attorney for William McKinnley Garland (1), is not opposed.

Richard Howard, the attorney for Jalen Alexander Bobo (2), is not opposed.

/s/ Brian O'Shea  
BRIAN O'SHEA  
*Attorney for Defendant*

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 8th day of January 2024, a true and correct copy of the foregoing Defendant's MOTION FOR CONTINUANCE OF PRETRIAL MOTION DATES, CHANGE OF PLEA DEADLINE, AND FINAL PRETRIAL CONFERENCE DATE was sent by CM/ECF to:

Marisa Miller  
Assistant U.S. Attorney  
101 East Park Blvd.  
Suite 500  
Plano, TX 75074

/s/ Brian O'Shea  
BRIAN O'SHEA  
*Attorney for Defendant*